

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

NIKKI BOLLINGER GRAE, Individually)	
and on Behalf of All Others Similarly)	
Situated,)	
)	
Plaintiff,)	Case No. 3:16-cv-02267
)	
v.)	Judge Aleta A. Trauger
)	
CORRECTIONS CORPORATION OF)	
AMERICA, DAMON T. HININGER,)	
DAVID M. GARFINKLE, and TODD J.)	
MULLENGER,)	
)	
Defendants.)	

**JOINT MOTION TO CONTINUE INITIAL
CASE MANAGEMENT CONFERENCE**

Plaintiff Nikki Bollinger Grae and Defendants Corrections Corporation of America (“CCA”), Damon T. Hininger, David M. Garfinkle and Todd J. Mullenger (collectively, the “Parties”) jointly move the Court to continue the initial case management conference currently scheduled for 1:00 p.m. on November 9, 2016. (Dkt. No. 5.)

On September 20, 2016, the Court entered a Stipulation and Order setting forth, in relevant part, a briefing schedule for Defendants’ response to the Consolidated Amended Complaint to be filed after the Court has appointed a Lead Plaintiff for this case. (Dkt. No. 21.) Pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), any member of the purported class has until October 24, 2016 to move the Court for appointment as Lead Plaintiff (15 U.S.C. § 78u-4(a)(3)(A)(i)(II)), and the Parties anticipate that the Court-appointed Lead Plaintiff will seek to file a Consolidated Amended Complaint. In addition, pursuant to the

PSLRA, all discovery and other proceedings are stayed during the pendency of any motion to dismiss (15 U.S.C. § 78u-4(b)(3)(B)).

Accordingly, the Parties respectfully request that the Court continue indefinitely the initial case management conference. The Parties submit that the conference can be reset, if necessary, after the Court has appointed a Lead Plaintiff in this action and ruled upon motions to dismiss the Lead Plaintiff's Consolidated Amended Complaint.

Respectfully submitted:

/s/ Paul Kent Bramlett

Paul Kent Bramlett (TN #7387)
Robert Preston Bramlett (TN
#25895)
40 Burton Hills Blvd., Suite 200
P.O. Box 150734
Nashville, TN 37215
T: (615) 248-2828
F: (866) 816-4116
pknashlaw@aol.com
robert@bramlettlawoffices.com

POMERANTZ LLP
Jeremy A. Lieberman
J. Alexander Hood II
Marc C. Gorrie
600 Third Ave., 20th Floor
New York, NY 10016
T: (212) 661-1100
F: (212) 661-8665
jalieberman@pomlaw.com
ahood@pomlaw.com
mgorrie@pomlaw.com

POMERANTZ LLP
Patrick V. Dahlstrom
10 South La Salle St., Suite 3505
Chicago, IL 60603
T: (312) 377-1181
F: (312) 377-1184
pdahlstrom@pomlaw.com

GOLDBERG LAW PC
Michael Goldberg
Brian Schall
1999 Avenue of the Stars
Suite 1100
Los Angeles, CA 90067
T: (800) 977-7401
F: (800) 536-0065
michael@goldberglawpc.com
brian@goldberglawpc.com

Attorneys for Plaintiff Nikki Bollinger Grae

/s/ Steven A. Riley

Steven A. Riley (TN #6258)

Milton S. McGee, III (TN #024150)

RILEY WARNOCK & JACOBSON, PLC

1906 West End. Ave.

Nashville, TN 37203

T: (615) 320-3700

F: (615) 320-3737

sriley@rwjplc.com

tmcgee@rwjplc.com

David J. Schindler

Brian T. Glennon

Nathan M. Saper

LATHAM & WATKINS LLP

355 South Grand Ave.

Los Angeles, CA 90071

T: (213) 485-1234

F: (213) 891-8763

david.schindler@lw.com

brian.glennon@lw.com

nathan.saper@lw.com

Attorneys for Defendants Corrections

Corporation of America, Damon T. Hininger,

David M. Garfinkle, and Todd J. Mullenger

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing document was made upon the following Filing Users through the Electronic Filing System:

Paul Kent Bramlett
Robert Preston Bramlett
BRAMLETT LAW OFFICES
40 Burton Hills Blvd., Suite 200
P.O. Box 150734
Nashville, TN 37215
pknashlaw@aol.com
robert@bramlettlawoffices.com

Jeremy A. Lieberman
J. Alexander Hood II
Marc C. Gorrie
POMERANTZ LLP
600 Third Ave., 20th Floor
New York, NY 10016
jalieberman@pomlaw.com
ahood@pomlaw.com
mgorrie@pomlaw.com

David J. Schindler
Brian T. Glennon
Nathan M. Saper
LATHAM & WATKINS LLP
355 South Grand Ave.
Los Angeles, CA 90071
david.schindler@lw.com
brian.glennon@lw.com
nathan.saper@lw.com

Patrick V. Dahlstrom
POMERANTZ LLP
10 South La Salle St., Suite 3505
Chicago, IL 60603
pdahlstrom@pomlaw.com

Michael Goldberg
Brian Schall
GOLDBERG LAW PC
1999 Avenue of the Stars, Suite 100
Los Angeles, CA 90067
michael@goldberglawpc.com
brian@goldberglawpc.com

this the 30th day of September, 2016.

/s/ Steven A. Riley